

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

CHAD MENIER

CIVIL ACTION NO.: _____

VERSUS

U.S. DISTRICT JUDGE: _____

**SEATRAN MARINE, LLC, TEXAS
CREWBOATS, INC. and M/V SEA ANGEL**

MAGISTRATE JUDGE: _____

COMPLAINT

NOW INTO COURT, through undersigned counsel, comes **CHAD MENIER**, a person of the full age of majority and resident of Evangeline Parish, Louisiana, who respectfully represent as follows:

I.

This action is brought pursuant to the provisions of the General Maritime Law of the United States of America, 28 U.S.C. § 1331 (federal question jurisdiction). Plaintiff asserts his claim pursuant to the provisions of the Federal Rules of Civil Procedure Admiralty Rule 9(h) and seeks a judge-only trial.

II.

Made Defendants herein are:

- 1.) SEATRAN MARINE, LLC**, a domestic limited liability company, authorized to do and doing business in the State of Louisiana, and within the jurisdiction of this Court. Seatran Marine, LLC is headquartered at 107 Hwy 90 West, New Iberia, Louisiana 70560, and can be served through its registered agent for service of process, Blake Miguez, 3820 Lake Palourde Road, Morgan City, Louisiana 70380;
- 2.) TEXAS CREWBOATS, INC.**, a corporation authorized to do and doing business in the State of Louisiana, and within the jurisdiction of this Court. Texas Crewboats, Inc. is headquartered at 222 West Second Street, Freeport,

Texas 77541, and can be served through its registered agent for service of process, Elliot Cundieff, 222 West Second Street, Freeport, Texas 77541; and

- 3.) M/V SEA ANGEL, *in rem*, a crew-supply vessel owned and operated by Seatran Marine and Texas Crewboats, Inc., a vessel doing business in the State of Louisiana and the Gulf of Mexico, and within the jurisdiction of this Court.

III.

At all times pertinent, Defendants, SEATRAN MARINE and/or TEXAS CREWBOATS, INC., were the owner, manager, operator and/or charterer of the M/V SEA ANGEL, an offshore mini-supply vessel.

IV.

Defendants are justly and truly indebted to CHAD MENIER for all damages that are reasonable on the premises, together with legal interest from date of occurrence until paid in full, and for all costs of these proceedings, by reason of the following:

V.

Upon information and belief, the M/V SEA ANGEL, through SEATRAN MARINE, LLC and TEXAS CREWBOATS, INC., was under contract to Castex Energy, an oil and gas company that owns and operates oil and gas wells throughout the United States, including the Gulf of Mexico.

VI.

Upon information and belief, Castex Energy contracted with Baker Hughes to do work on projects in the Gulf of Mexico.

VII.

On or about October 8, 2015, CHAD MENIER was employed by Baker Hughes as a Field Supervisor. He was sent by Baker Hughes to do a job on the Ensco 87 drilling rig in the Gulf of Mexico for Castex Energy.

VIII.

CHAD MENIER was to be transported from land to his offshore destination on the M/V SEA ANGEL, owned by SEATRAN MARINE, LLC and TEXAS CREWBOATS, INC.

IX.

Plaintiff boarded the M/V SEA ANGEL at approximately 1:00 a.m. by use of a gangway, set in place by the crew of the vessel. There was no lighting and visibility was impaired. Due to the lack of visibility and the manner in which the gangway was fixated upon the boat, Plaintiff, through no fault of his own, stepped off of the walkway, tripped and fell, landing on the deck boards.

X.

As a result of the incident, Plaintiff fractured two bones in his right ankle, in addition to other bodily injuries.

XI.

Plaintiff alleges that the legal cause of the accident, and the injuries he sustained, was the negligence of Defendants and their employees, including but not limited to that of the crew of M/V SEA ANGEL.

XII.

Because of the accident, Plaintiff suffered disabling injuries, he has endured pain, suffering and mental anguish, and will continue to suffer in the future. He will no longer be able to engage in his chosen occupation, he has sustained and will continue to sustain a substantial loss of income, impaired earning capacity, and diminished employment-related benefits.

XIII.

The injuries sustained by CHAD MENIER include injuries to his body and mind, which will in all likelihood prevent him from performing the necessary duties of a Field Supervisor for the rest of his life, and on information and belief, any occupation requiring hard, physical labor.

XIV.

Plaintiff alleges that because of the injuries and damages to his mind and body, he is entitled to recover all damages that are reasonable on the premises.

XV.

WHEREFORE, Petitioner, CHAD MENIER, prays that after due proceedings had, there judgment be in his favor and against SEATRAN MARINE, LLC, TEXAS CREWBOATS, INC, and the M/V SEA ANGEL, *in rem*, for all legally recoverable damages, together with legal interest from date of occurrence until paid in full, and for all costs of these proceedings. CHAD MENIER further prays for all general and equitable relief, and that expert fees be taxed as costs of court.

Respectfully submitted,

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PLEASE SERVE DEFENDANTS:

SEATRAN MARINE, LLC

Through its registered agent for service of process:

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Morgan City, Louisiana 70380

TEXAS CREWBOATS, INC.

Through its registered agent for service of process:

Elliot Cundieff

222 West Second Street

Freeport, Texas 77541

M/V SEA ANGEL

Through its registered agent for service of process:

Elliot Cundieff

222 West Second Street

Freeport, Texas 77541